

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

JULY 23 2015  
WILLIAM M. McCOOL, Clerk  
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

JAY MICHAUD,  
Defendant.

**CR 15-5351 RJB**  
INDICTMENT

The Grand Jury charges that:

**COUNT 1**  
**(Possession of Child Pornography)**

On or about July 10, 2015, at Vancouver, within the Western District of Washington, and elsewhere, JAY MICHAUD did knowingly possess matter that contained visual depictions the production of which involved the use of minors engaging in sexually explicit conduct, and the visual depictions were of such conduct, that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which had been produced using materials that had been mailed and shipped and transported in and affecting interstate and

1 foreign commerce by any means, including by computer, and the images of child  
2 pornography involved include images of a prepubescent minor and a minor who had not  
3 attained 12 years of age.

4 All in violation of Title 18, United State Code, Section 2252(a)(4) and 2252(b)(2).

5 **COUNT 2**  
6 **(Receipt of Child Pornography)**

7 On a date unknown, but between February 21, 2015 and March 2, 2015, at  
8 Vancouver, within the Western District of Washington, and elsewhere, JAY MICHAUD  
9 did knowingly receive, and attempt to receive, visual depictions the production of which  
10 involved the use of minors engaging in sexually explicit conduct, and the visual  
11 depictions were of such conduct, using any means and facility of interstate and foreign  
12 commerce and which images had been mailed and shipped and transported in and  
13 affecting interstate and foreign commerce by any means, including by computer.

14 All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

15 **ASSET FORFEITURE ALLEGATION**

16 Upon conviction of the offenses alleged in Counts 1 and 2 of this Indictment, JAY  
17 MICHAUD shall forfeit to the United States, pursuant to Title 18, United States Code,  
18 Section 2253, any property, real or personal, used or intended to be used to commit or  
19 promote the commission of such offenses, or any property traceable to such property, and  
20 any and all visual depictions as described in Title 18, United States Code, Sections 2251,  
21 2252, and 2252A, which were produced, transported, mailed, shipped, or received, in  
22 violation of Chapter 110, Title 18, United States Code, including but not limited to:

- 23 a. Any and all images of child pornography, in whatever format and however  
24 stored;

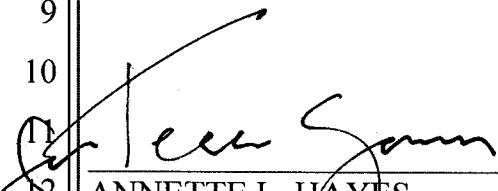
- 1 b. a SanDisk Ultra USB 3.0 32 Gigabyte thumb drive;  
2 c. a SanDisk Cruzer 2 Gigabyte flashdrive.  
3

4 A TRUE BILL:


5 DATED: 7-23-15  
6

7 *Signature of foreperson redacted*  
8 *pursuant to the policy of the Judicial*  
9 *Conference of the United States*

10 \_\_\_\_\_  
11 FOREPERSON

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13 ANNETTE L. HAYES  
14 United States Attorney

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16 MICHAEL DION  
17 Assistant United States Attorney

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19 S. KATE VAUGHAN  
20 Assistant United States Attorney  
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